

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE
ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
C.R. BARD, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and Defendant C.R. Bard, Inc. (“Bard”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a defendant in these actions with prejudice, and terminate Bard from the docket in the actions, parties to bear their own costs. Other Defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Richard B. North, Jr.
NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station, 201 17th Street, NW
Suite 1700
Atlanta, GA 30363
(404) 322-6000

Attorney for Defendant C.R. Bard, Inc.

/s/ Caroline L. Maida

Caroline L. Maida
MOSTYN LAW
3810 West Alabama Street
Houston, TX 77027
(713) 861-6616 Telephone
(713) 861-8084 Facsimile

Attorney for Plaintiffs on Exhibit A

Dated: March 16, 2018

/s/ Mark R. Mueller

Mark R. Mueller
MUELLER LAW
404 West 7th Street
Austin, TX 78701
(512) 478-1236 Telephone
(512) 478-1473 Facsimile

Attorney for Plaintiff on Exhibit B

Dated: March 16, 2018

EXHIBIT A – MOSTYN LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-cv-13468	Christye Leah Bixler and Frank Bixler v. C.R. Bard, Inc., et al.
2:14-cv-23060	Carole Lee Wilson and John Wilson, Jr. v. C.R. Bard, Inc., et al.
2:15-cv-14519	Judy Schmidt and Donald Schmidt v. C.R. Bard, Inc., et al.
2:15-cv-15423	LeAnn Westereng v. C.R. Bard, Inc., et al.
2:16-cv-01317	Michell Lazov v. C.R. Bard, Inc., et al.

EXHIBIT B – MUELLER LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-01207	Joyce Adams vs. C.R. Bard, Inc., et al.

CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.